

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

Allianz Global Investors GmbH, et al.,

Plaintiffs,

-against-

Bank of America Corporation, et al.,

Defendants.

Case No.: 1:18-cv-10364

**~~PROPOSED~~ ORDER GRANTING UNOPPOSED MOTION FOR ISSUANCE OF A  
HAGUE CONVENTION REQUEST FOR INTERNATIONAL JUDICIAL ASSISTANCE  
TO TAKE TESTIMONY OVERSEAS**

The Court, having reviewed Plaintiffs' Unopposed Motion for Issuance of a Hague Convention Request for International Judicial Assistance to Take Testimony Overseas as well as the papers in support and opposition, HEREBY ORDERS THAT:

1. The Motion is GRANTED.
2. The Request for International Judicial Assistance Pursuant to the Hague Convention of 18 March 1970 on the Taking of Evidence Abroad in Civil or Commercial Matters attached as Exhibit A to this order, is hereby issued as the Court's "Letter of Request" and is fully incorporated herein.
3. The signed Order and the Letter of Request will be given to Quinn Emanuel Urquhart & Sullivan LLP, who will cause both documents to be filed with Registrar of the High Court of the Hong Kong Special Administrative Region of the People's Republic of China, 38 Queensway, Hong Kong, People's Republic of China.
4. The Stipulation and Order of Confidentiality (ECF No. 157) in this action shall apply to the deposition, including the transcript and video.

5. This Order, the deposition of Alvin Ip or the terms of the Letter of Request (which are incorporated into this Order) shall not be construed or operate as a waiver of any argument, position, objection, allegation, or claim or defense of any party in the above-captioned action, or of the attorney-client privilege, the work product doctrine, or any other privileges, rights, protections, or prohibitions that may apply to that evidence under the laws of Hong Kong, the United States of America, or the State of New York.

IT IS SO ORDERED.

DATED: 4/5/2022



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THE HONORABLE STEWART D. AARON  
UNITED STATES MAGISTRATE JUDGE